

NO. PD-0881-20

IN THE COURT OF CRIMINAL
APPEALS OF THE STATE OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
7/23/2021
DEANA WILLIAMSON, CLERK

CRYSTAL MASON,

Appellant,

V.

STATE OF TEXAS,

Appellee.

From the Second Court of Appeals,
Cause No. 02-18-00138-CR

Trial Court Cause No. 148710D
From the 432nd District Court of Tarrant County, Texas
The Honorable Ruben Gonzalez, Jr. Presiding

MOTION FOR ADMISSION *PRO HAC VICE*
FOR SOPHIA LIN LAKIN

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

Sophia Lin Lakin (“Applicant”) respectfully files her Motion for Admission
Pro Hac Vice to appear on behalf of Appellant Crystal Mason pursuant to Texas
Government Code § 82.001, *et seq.* and Rule XIX of the Rules Governing
Admission to the Bar of Texas.

1. Applicant's contact information is: American Civil Liberties Union Foundation, Inc., 125 Broad Street, 18th Floor, New York, New York 10004; Phone: (212) 519-7836; Fax: (212) 549-2654; email: slakin@aclu.org.

2. Applicant will be associated in this proceeding with Thomas Buser-Clancy. Thomas Buser-Clancy is an attorney licensed in Texas and will remain associated in these proceedings. Mr. Buser-Clancy's contact information is: American Civil Liberties Union Foundation of Texas, P.O. Box 8306, Houston, Texas 77288; Telephone: (713) 325-7011; Fax: (713) 942-8966; email: tbuser-clancy@aclutx.org; Texas State Bar No. 24078344.

3. Applicant has appeared *pro hac vice* in the Western District of Texas, San Antonio Division, *Texas LULAC, et al v. Whitley, et al, Civil Action*, No. 19-cv-00074. The case was jointly dismissed on April 29, 2019. Applicant has also appeared *pro hac vice* in the lower court proceedings of this case in the Court of Appeals for the Second District of Texas at Fort Worth, No. 02-18-00138-CR.

4. Applicant is an active member in good standing in each of the following courts and jurisdictions:

Court:	Admission Date:
State of New York	November 18, 2013

Eastern District of Wisconsin	May 11, 2015
Fourth Circuit Court of Appeals	April 28, 2016
Tenth Circuit Court of Appeals	May 4, 2016
Sixth Circuit Court of Appeals	April 6, 2017
Eighth Circuit Court of Appeals	November 4, 2016
Fifth Circuit Court of Appeals	May 22, 2017
Eleventh Circuit Court of Appeals	May 17, 2017
Supreme Court of the United States	June 12, 2017
Seventh Circuit Court of Appeals	July 24, 2018
Third Circuit Court of Appeals	November 24, 2020

5. Applicant has not been the subject of any disciplinary action by any of the above-listed courts, or any state or federal courts in any jurisdiction of the United States.

6. Applicant has not been denied admission to any state or federal courts in the United States during the preceding five (5) years.

7. Applicant is familiar with the Texas State Bar Act, the Texas State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas and will at all times abide by and

comply with same so long as this matter is pending, and she has not withdrawn as counsel herein.

8. Pursuant to Rule XIX(b) of the Rules Governing Admission to the Bar of Texas, Applicant submits Mr. Buser-Clancy's motion concurrently with this Motion, which contains a statement that he finds Attorney Lakin to be a reputable attorney and recommending that Attorney Lakin be granted permission to participate in this matter before the Court.

9. Pursuant to Rule XIX(c) of the Rules Governing Admission to the Bar of Texas, Applicant submits the Non-Resident Acknowledgment Letter from the Texas State Board of Law Examiners. See Exhibit A, Acknowledgment Letter.

WHEREFORE, Applicant respectfully requests that this Motion and enter an order allowing her to participate as one of the attorneys for Appellant Crystal Mason, in the above captioned and numbered cause of action.

Respectfully submitted,

/s/ Sophia Lin Lakin

Sophia Lin Lakin

New York Bar No. 5182076

American Civil Liberties Union

Foundation, Inc., 125 Broad Street,
18th Floor,

New York, New York 10004; Phone:

(212) 519-7836;

Fax: (212) 549-2654

slakin@aclu.org

/s/ Thomas Buser-Clancy

Thomas Buser-Clancy Texas Bar

No. 24078344 ACLU Foundation of
Texas

P.O. Box 8306 Houston, TX 77288

Telephone: (713) 325-7011

Fax: (713) 942-8966

Tbuser-clancy@aclutx.org

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of July, 2021, a true and correct copy of the foregoing was properly served on all counsel of record in this above-captioned case in accordance with the Texas Rules of Appellate Procedure through this Court's electronic filing system.

/s/ Thomas Buser-Clancy
Thomas Buser-Clancy

EXHIBIT A

Board of Law Examiners
Appointed by the Supreme Court of Texas

June 23, 2021

Sophia Lin Lakin
Via: E-Mail

Acknowledgment Letter
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: Sophia Lin Lakin

Case: No. PD-0881-20

Texas court or body: Court of Criminal Appeals

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Cordially,



Nahdiah Hoang
Executive Director

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Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Christopher Clay on behalf of Thomas Buser-Clancy
Bar No. 24078344
cclay@aclutx.org
Envelope ID: 55624761
Status as of 7/23/2021 8:52 AM CST

Associated Case Party: Crystal Mason

Name	BarNumber	Email	TimestampSubmitted	Status
Thomas Buser-Clancy	24078344	tbuser-clancy@aclutx.org	7/22/2021 5:02:26 PM	SENT
Sophia LinLakin		slakin@aclu.org	7/22/2021 5:02:26 PM	SENT
Dale E.Ho		dho@aclu.org	7/22/2021 5:02:26 PM	SENT
Emma Hilbert		emma@texascivilrightsproject.org	7/22/2021 5:02:26 PM	SENT
Hani Mirza		hani@texascivilrightsproject.org	7/22/2021 5:02:26 PM	SENT
Alison Grinter		alisongrinter@gmail.com	7/22/2021 5:02:26 PM	SENT
Kim T.Cole		kcole@kcolelaw.com	7/22/2021 5:02:26 PM	SENT
Andre Segura		asegura@aclutx.org	7/22/2021 5:02:26 PM	SENT
Savannah Kumar	24120098	skumar@aclutx.org	7/22/2021 5:02:26 PM	SENT

Case Contacts

Name
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Robert Rivera
Tom Leatherbury
Robert R.Landicho
Ashley Wiens
Joseph Wilson Spence
Keeley Lombardo
Tanya McGinnis
Rebecca HarrisonStevens
Stacey Soule
Helena Faulkner

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Case Contacts

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